

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

CIVIL ACTION NO. 11-1328

ALONZO KEMP, PLAINTIFF,

V.

JURY TRIAL DEMANDED

THE CITY OF PITTSBURGH POLICE
OFFICER DAVID M. SISAK,
DEFENDANTS.

RECEIVED

OCT 19 2011

CLERK, U S DISTRICT COURT
WEST DIST OF PENNSYLVANIA

CAUSE OF ACTION:

1. The cause of action is pursuant to the civil rights act of 1871, 42 U.S.C. §1983:

JURISDICTION:

2. The United States District Court for the Western District of Pennsylvania has jurisdiction over the action pursuant to the provisions under 28 U.S.C. §1331:

PARTIES ADDRESSES:

3. Plaintiff, Alonzo Kemp, whoms address is S.C.I. Mercer, 801 Butler Pike, Mercer, Pennsylvania 16137:

4. Defendant, David M. Sisak, whoms address is City of Pittsburgh Police Station Zone 5 Washington Boulevard, Pittsburgh Pennsylvania 15206:

5. Defendant, City of Pittsburgh whoms address is 313 City-County Building, Pittsburgh Pennsylvania 15219:

FEDERAL LAW OFFENDED:

6. The United States constitution fourth, fifth, fourteenth amendments deprivation of life, liberty or property without due process of law:

CIVIL RIGHTS COMPLAINT:

7. This is a civil rights violation wherein the plaintiff was falsely arrested on October 23, 2009, by city of Pittsburgh police officers in the city's Garfield section;

the plaintiff was charged with various vehicle and drug violations, see, affidavit of probable cause attached as Exhibit (A);

the allegations of probable cause presents a myriad of perplexing constitutional problems due to deliberate fraudulent mis-statements by police officer-affiant David M. Sisak, as to the validity of the material facts within the allegation of probable cause, Commonwealth V. D'Angelo 437 PA. 331 (1970):

thus police officer-affiant David M. Sisak elected to falsify the allegation of probable cause as to the allege statement by the plaintiff stating "Aw man all I have is a little bag of weed on me" when in fact police officer-affiant David M. Sisak fabricated said statement as attested to by the plaintiffs affidavit attached as Exhibit (b);

the fifth amendment to the united states constitution in part states "No person shall be compelled in any criminal case to be a witness against himself as suggested in the instant affidavit of probable cause in Exhibit (A);

hence the validity concerns a fact necessary to establish legal probable cause within the confines of the fourth, fifth, fourteenth amendments to the united states constitution:

FAILURE TO TRAIN, SUPERVISE OR DISCIPLINE:

8. The plaintiff would call Dwayne Owens who was arrested and shot in his femur by city police in May of 2009 ;

the plaintiff would call Jaquay Sears who was arrested on September 5, 2008, and hit in the head with a night stick wielded by city of Pittsburgh police officers and as a result Sears was transported to UPMC where he received 7 staples in his head;

the plaintiff would call Dior Robinson and his girlfriend Maria Morris they were both arrested by city police officers and handcuffed and placed on the ground a K-9 officer came to the

scene and city police officers enticed the dog to bite them resulting in Robinson going to West Penn Hospital and Morris going to Southside Hospital;

the plaintiff would call Lateef Mason who was arrested by city police officers in July 2009, and charged with VUFA his case was tried before a jury and he was acquitted because they believed the city police did not tell the truth;

the plaintiff would call Jordan Miles who was arrested and beaten by city police officers who used racial slurs and planted/destroyed evidence which is consistent with the city of Pittsburgh's failure to properly train, supervise or discipline its police force:

COMPENSATORY DAMAGES:

9. Plaintiff seeks actual damage from defendant David M. Sisak in excess of fifty thousand \$50.000 dollars for civil rights injuries:

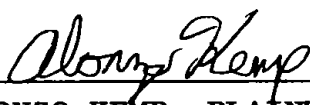
10. Plaintiff seeks actual damage from defendant City of Pittsburgh in excess of fifty thousand dollars for civil rights injuries:

PUNITIVE DAMAGES:

11. Plaintiff seeks punitive damage from defendant David M. Sisak in excess of fifty thousand \$50.000 dollars for civil rights injuries and to deter future civil rights violations:

I, the undersigned hereby declare under penalty of perjury
that the foregoing is true and correct 28 U.S.C. §1746

SIGNED 17th, THIS DAY OF OCTOBER, 2011,



ALONZO KEMP, PLAINTIFF: